## UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

NATALIE REESER,

Plaintiff, Hon. George Caram Steeh

Case No.: 2:14-cv-11916

v.

HENRY FORD HOSPITAL,

Defendant.

MILLER COHEN, P.L.C. VARNUM LLP

Keith D. Flynn (P74192) Terrence J. Miglio (P30541) Attorney for Plaintiff Barbara E. Buchanan (P55084)

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# **DEFENDANT'S INITIAL WITNESS LIST**

NOW COMES Defendant, HENRY FORD HOSPITAL, by and through

its attorneys, VARNUM, LLP, and for its Initial Witness List, states as follows:

Jackie Allen
 Kidney & Hypertension Center P.C.
 15945 19 Mile Road, Suite 206
 Clinton Twp., Michigan 48038

- Maria Anger
   Henry Ford Medical Laboratories
   Henry Ford Health System
   2799 W. Grand Blvd.
   Detroit, Michigan 48202
- 3. Marguerite Bayer, Investigator
  State of Michigan
  LARA
  Wage and Hour Division
  7150 Harris Drive
  P.O. Box 30476
  Lansing, Michigan 48909
- 4. Fiona Bork
   Henry Ford Medical Laboratories
   Henry Ford Health System
   2799 W. Grand Blvd.
   Detroit, Michigan 48202
- 5. Joseph Candila
- 6. Salvatone Centene
- 7. Mary Ann Dickerson
- 8. Nawaal Elhaddi Henry Ford Health System 2799 W. Grand Blvd. Detroit, Michigan 48202
- 9. Alicia Estell
  Henry Ford Medical Laboratories
  Henry Ford Health System
  2799 W. Grand Blvd.
  Detroit, Michigan 48202
- 10. Dr. Mohammad Ghaffarloo Henry Ford Health System 15945 19 Mile Road, Suite 100 Clinton Twp., Michigan 48038

# 11. Julisa GarciaHenry Ford Medical LaboratoriesHenry Ford Health System2799 W. Grand Blvd.Detroit, Michigan 48202

- Denise Goldsmith
  Henry Ford Medical Laboratories
  Henry Ford Health System
  2799 W. Grand Blvd.
  Detroit, Michigan 48202
- 13. Luain Hajjar
  Henry Ford Medical Laboratories
  Henry Ford Health System
  2799 W. Grand Blvd.
  Detroit, Michigan 48202
- 14. Jill E. Hood, PHRHenry Ford Health System2799 W. Grand Blvd.Detroit, Michigan 48202
- 15. Jenny Hudson
- Shameeka JohnsonHenry Ford Medical LaboratoriesHenry Ford Health System2799 W. Grand Blvd.Detroit, Michigan 48202
- 17. Tanisha Jordan
  Henry Ford Medical Laboratories
  Henry Ford Health System
  2799 W. Grand Blvd.
  Detroit, Michigan 48202
- 18. Reza Kahnamouei, M.D.43361 Commons DriveClinton Twp., Michigan 48038
- 19. Wendy Reed Leach

- Zef Lucaj, M.D.15945 19 Mile Road, Suite 106Clinton Twp., Michigan 48038
- 21. Vicky Lucaj 15945 19 Mile Road, Suite 106 Clinton Twp., Michigan 48038
- Deserie Miller
  Henry Ford Medical Laboratories
  Henry Ford Health System
  2799 W. Grand Blvd.
  Detroit, Michigan 48202
- Dr. Mark MishackKidney & Hypertension Center P.C.15945 19 Mile Road, Suite 206
- 24. Jennifer Moss
- 25. Jill Nis
- 26. Kathy OswaldHenry Ford Health System2799 W. Grand Blvd.Detroit, Michigan 48202
- 27. Rebecca PilarskiHenry Ford Health System2799 W. Grand Blvd.Detroit, Michigan 48202
- 28. Deborah Reeser
- 29. Natalie K. Reeser 69156 Florence Drive Richmond, Michigan 48062
- 30. Angela Smith

- 31. Debra Temrowski
  Henry Ford Health System
  2799 W. Grand Blvd.
  Detroit, Michigan 48202
- 32. Anand Thakur, M.D.ANA Pain Management, P.C.15945 19 Mile Road, Suite 202Clinton Twp., Michigan 48038
- 33. Hally Waller
- 34. Kyle Waller
- John WaughHenry Ford Health System2799 W. Grand Blvd.Detroit, Michigan 48202
- 36. Jennifer Wierbicki
- 37. Denise Williams
- 38. Martha Wiseheart
  Henry Ford Medical Laboratories
  Henry Ford Health System
  2799 W. Grand Blvd.
  Detroit, Michigan 48202
- 39. Custodian of the Records:
  - a. Davenport University Michigan
  - b. Davis Smith Inc.27764 Franklin RoadSouthfield, Michigan 48034
  - c. Equal Employment OpportunityCommission477 Michigan AvenueDetroit, Michigan 48226

- d. Henry Ford HospitalHenry Ford Health System2799 W. Grand Blvd.Detroit, Michigan 48202
- e. Home Helpers, Inc. 66707 Van Dyke Road Washington, Michigan 48095
- f. Jeffrey Automotive Group, LLC Jeffrey Buick-Nissan 30800 Gratiot Avenue Roseville, Michigan 48066
- g. Reza Kahnamouei, M.D.43361 Commons DriveClinton Twp., Michigan 48038
- h. Kirtland Community College 10775 N. St. Helen Road Roscommon, Michigan 48653
- i. Macomb County Circuit Court 40 N. Main Street Mt. Clemens, Michigan 48038
- j. Michigan Department of Civil Rights 3054 West Grand Blvd., Suite 3-600 Detroit, Michigan 48202
- k. Michigan Department of Labor Bureau of Workers Disability Compensation
  P.O. Box 30016
  Lansing, Michigan 48900
- Right at Home
   8344 Hall Road, Suite 207
   Utica, Michigan 48317
- m. Rochester College800 West Avon RoadRochester Hills, Michigan 48307

- n. St. Joseph Mercy Hospital-Clinton Twp.
- o. State of Michigan LARA Wage and Hour Division 7150 Harris Drive P.O. Box 30476 Lansing, Michigan 48909
- p. U.S. Bankruptcy Court211 W. Fort StreetDetroit, Michigan 48226
- q. Visiting Angels
   42140 Van Dyke Avenue, Suite 200
   Sterling Heights, Michigan 48314
- 40. Elissa Benedek, M.D. (Psychiatry Expert) 2311 East Stadium Blvd., Suite 111 Ann Arbor, Michigan 48104
- 41. Charles R. Clark, Ph.D. (Psychology Expert) 117 N. 1<sup>st</sup> Street Ann Arbor, Michigan 48104
- 42. Van Conway (Economic Expert) 401 S. Old Woodward Ave., Suite 340 Birmingham, Michigan 48009
- 43. Gary Leeman (Economic Expert) 39300 W. Twelve Mile Road, Suite 100 Farmington Hills, MI 48331
- 44. Kenneth Myers (Mitigation Expert) 26600 West Fourteen Mile Road Bloomfield Hills, Michigan 48301
- 45. Ronald T. Smolarski, M.A., CLCP, CRC (Vocational Expert) 114 Felch Ann Arbor, Michigan 48103
- 46. Any and all past or present employees of Defendant Henry Ford Hospital.
- 47. Any and all past or present employers of Plaintiff.

48. Any and all physicians, psychologists, psychiatrists or other medical professionals who have examined and/or treated Plaintiff.

- 49. Any and all rebuttal or impeachment witnesses.
- Any and all witnesses identified through additional discovery or 50. investigation.
- 51. Any and all witnesses disclosed at trial.
- 52. Any and all witnesses listed on Plaintiff's Witness List(s).
- Any and all expert witnesses listed on Plaintiff's Witness List(s). 53.
- 54. Defendant reserves the right to add to or delete names from its Witness List pursuant to further discovery.

By submitting this Initial Witness List, Defendant does not waive any objections to the admissibility of the testimony of these witnesses. Instead, this list is submitted indicating potential witnesses Defendant may produce.

Respectfully submitted,

### VARNUM LLP

By: /s/ Terrence J. Miglio Terrence J. Miglio (P30541) Barbara E. Buchanan (P55084) Attorneys for Defendant 39500 High Pointe Blvd., Ste. 350 Novi, MI 48375 248-567-7828 timiglio@varnumlaw.com

bebuchanan@varnumlaw.com

Dated: September 30, 2014

# **CERTIFICATE OF SERVICE**

I hereby certify that on September 30, 2014, I caused the foregoing documents to be electronically filed with the Clerk of the Court using the ECF System, which will send notification of such filing to all counsel of record.

/s/ Terrence J. Miglio

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